



John Venardos Vice President
Worldwide Regulatory & Government Affairs

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April 18, 2005

Dr. Robert J. Moore
Branch Chief, Compliance & Enforcement Branch
Office of Nutrition Products, Labeling & Dietary Supplements
FOOD & DRUG ADMINISTRATION (HFS-800)
5100 Paint Brush Parkway
College Park, Maryland 20740

APR 22 2005

Ref: **LIFTOFF™ Effervescent Energy Drink Dietary Supplement (N762-00)**

Dear Dr. Moore:

Pursuant to 21CFR§101.93, please be advised Herbalife International of America, Inc. has begun commercializing **LIFTOFF™ Effervescent Energy Drink Dietary Supplement**.

LIFTOFF™ Effervescent Energy Drink Dietary Supplement is labeled and promoted with statements provided for in Section 403 (r) (6) of the Federal Food, Drug and Cosmetic Act.

Launch your energy into orbit with **LIFTOFF™ Effervescent Energy Drink**. **LIFTOFF™** gives you the explosive boost you need for body and mind, whenever your engine is running on empty.*

LIFTOFF™'s proprietary energy blend fights fatigue and helps you stay alert and focused for improved concentration.*

Also contains 100% RDI of Vitamin C, a powerful antioxidant, and more than 100% RDI of Vitamins B6 and B12, essential nutrients for long-lasting energy production.*

- Enhance mental performance*
- Improve short-term memory*
- Promote fast, accurate thinking*
- Reduce mental fatigue*

A convenient, on-the-go energy drink that won't cause the jitters.*

The product label prominently bears the required DSHEA disclaimer statement: "These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease."

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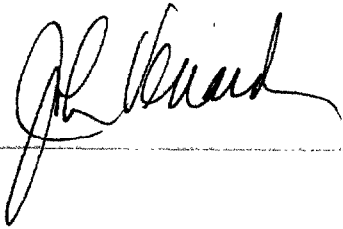
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Labeling and Dietary Supplements
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Please be advised that we have substantiation on file that these claims are truthful and not misleading.

If you have any questions please do not hesitate to ask.

Sincerely,

A handwritten signature in black ink, appearing to read "J. H. K. K. K.", is written over a horizontal line.

